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# AMS Summary Comments on the Office of Management and Budget Proposed Rule on Regulation for Federal Financial Assistance

The American Meteorological Society (AMS) is concerned that the Office of Management and Budget's (OMB's) recently proposed rule, if implemented, would damage the nation's ability to understand, predict, and respond to severe weather, drought, and other natural hazards with negative impacts on public safety and the economy.

The rule, as written, can be expected to cause reductions in the availability of environmental information for public audiences; slow the commercialization of advances in weather, water, and climate science; and reduce potential for future advances in the science of understanding and prediction of the Earth system.

Here we highlight five primary concerns with the proposed rules:

1. Reduced public access to weather, water, and climate information as recipients of federal funding face new restrictions on public communication of their scientific knowledge and understanding "(§ 200.450);

2. Reduced commercialization potential due to restrictions on the use of government funding to attend meetings where opportunities for researchers to engage directly with the private sector abound (§ 200.454, and § 200.432);

3. Reduced emphasis on scientific merit for grants as political appointees may prioritize political interests and may not possess state-of-the-art technical knowledge and understanding with respect to science (§ 200.202(a)(iii), § 200.205);

4. Reduced stability for projects requiring sustained effort and investment (e.g., long-term observations, long-running research projects, and training of the future scientific workforce) as political winds and interests shift (§ 200.211, § 200.340, § 200.341, § 200.342, § 200.343); and

5. Reduced opportunities for scientific advancement as scientists would be more limited in how they report their research findings in scientific journals (§ 200.461) and less able to attend meetings where discussions of recent events, research advances, and the potential new projects occur (§ 200.432, § 200.454).

Federal investments provide stability for long-running and cost-intensive projects such as the deployment of geostationary satellites that observe the Earth from space and the provision of high-performance computing used for weather forecast models. Academic, corporate, and NGO partners build on this foundation, as does collaboration with other nations through data sharing agreements for observations. In some cases, the proposed rule appears to create costly and inefficient regulatory burdens on scientists and the institutions that support scientists, which would result in redirecting investment away from research and observations themselves.

The impact of the proposed rules on emergency response would be immediate, as government-funded scientists face new risks if they share information with public audiences, including that related to hazardous weather events. Crucially, such events cause hundreds of deaths and thousands of injuries each year. Additional restrictions on the use of grant funds would make it more difficult for scientists to attend meetings that follow soon after disasters. Such meetings improve recovery efforts and accelerate our ability to learn from hazardous events. Over longer periods, restrictions on using grant funding to attend scientific meetings will diminish collaboration among scientists and with private sector partners. This would slow both scientific advancement and the commercialization of new weather-related products and services based on the latest scientific understanding.

A thriving weather, water, and climate enterprise is essential to protecting life, health, property, prosperity, and national security. The U.S. federal government contributes directly by providing observations, science, and services; supports nonfederal partners to contribute to a broader network of capabilities; and advances the entire enterprise by funding science and providing stable science policy, such as data quality standards and public access to data. The return on investment to U.S. taxpayers has been extraordinary, with current estimates of the value of weather information to the U.S. economy exceeding $100 billion annually, roughly 10 times the investment made by U.S. taxpayers through the federal agencies involved in weather-related science and services.

The U.S. weather enterprise is the most effective and fully developed in the world because it successfully balances roles among the government, private companies, nongovernmental organizations (NGO), and academic institutions. We are concerned

that the proposed changes would negatively affect science and services provided directly by the government along with the ability of nonfederal partners to support and advance weather, water, and climate capabilities for years to come.